REMARKS

Claims 45 through 55 (of which Claim 45 is an independent claim) were pending at the time of the last examination, and were rejected in the Office Action dated August 13, 2003 (hereinafter referred to as "the Office Action"). Reconsideration and allowance for the above-identified application are now respectfully requested. Independent claim 45 is amended to incorporate the features of previous claim 46, which is now cancelled. In addition, claims 56 through 70 (of which independent claims 56 and 64 are independent) are added herein. Entry of the amendments herein is respectfully requested in light of the Request for Continuing Examination (RCE) filed herewith.

Claims 45 through 55 stand rejected as being unpatentable over United States patent number 6,075,570 issued to Usui et al. (hereinafter referred to as "Usui") in view of United States patent number 6,157,411 issued to Williams et al. (hereinafter referred to as "Williams").

Summary of Usui

Usui is the primary references used by the Office Action to reject all of the claims. Usui teaches "an electronic program guide system having a storage means for storing a first electronic program guide of a first system and a second electronic program guide of a second system different than the first system and an integrating means for integrating the first and second electronic program guides" (Usui, Col. 2, lines 8-13).

Usui teaches that several connected devices may receive different EPG data in different formats. For example, the IRD 4 of Usui (See Figure 1 of Usui) receives EPG data from an MPEG video satellite broadcast (see Usui, Col. 4, lines 12-13, and Col. 5, lines 44-56). A TV receiver 5 (see also Figure 1 of Usui) receives VHF transmissions and extracts the EPG from the Vertical Blanking Interval (VBI) of the transmission (see Usui, Col. 7, lines 38-47).

Usui then describes two alternative paths that may be used to stored the EPG data from the IRD 4 and TV receiver 5 into the EPG receiver. One is described with respect to Figure 7 (hereinafter referred to as "the Figure 7 method"), and the other is described with respect to Figure 8 (hereinafter referred to as "the Figure 8 method").

According to the Figure 7 method, once the EPG receiver 6 receives the EPG data from one of the devices (see Usui, Col. 9, lines 7-9), the EPG data may be stored according to

conditions specified by the user (see Usui, Col. 9, lines 21-44). This may be repeated for another piece of equipment (see Usui, Col. 9, lines 45-46). The Figure 7 method thus involves conditioning of EPG data prior to storage in an EPG receiver 6. However, the Figure 7 method does not perform any format conversion at all prior to storage in the EPG receiver 6 (see Usui, Col. 10, lines 14-28).

According to the Figure 8 method, once the EPG receiver 6 receives the EPG data from one of the devices (see Usui, Col. 10, lines 38-41), the EPG data is converted into a predetermined integrated format (see Usui, Col. 10, lines 42-46). This likewise may be repeated for another piece of equipment (see Usui, Col. 10. lines 49-50) in which the received EPG data is once again reformatted into the predetermined integrated format (see Usui, Col. 10, lines 57-60). Accordingly, the Figure 8 converts the EPG data into an integrated format. However, the user specified conditioning is only applied after storage, not before (see Usui, Col. 13, lines 7-11).

There is no single method described by Usui in which user-specified conditioning AND reformatting are applied prior to storage. There would be no motivation to meld the teachings of the Figure 7 method and the Figure 8 method to arrive at such a method since they are both inherently mutually exclusive. For example, Usui teaches that the Figure 7 method will require large memory usage since EPG data is in different formats (see Usui, Col. 10, lines 17-25). If Usui taught a mechanism for reformatting prior to storage in accordance with the method of Figure 7, there would be no such requirement for a large memory requirement. Usui provides the Figure 8 method as an alternative to avoid large memory requirements. Accordingly, Usui does not teach or suggest the integration of multiple EPG data into a standardized format AND user-specified conditioning is applied prior to storage.

As a side note, the passage quote by the Office Action as being relevant to Claim 45 (Usui, Col. 8, lines 25-46) refers to reformatting of commands issued by the EPG receiver 6 when the EPG gathering devices (e.g., IRD 4 and TV receiver 5) do not follow the same command format. This passage does not, as the Office Action seems to suggest, teach the reformatting of the EPG data itself.

Summary of Williams

Williams teaches a method and apparatus for compiling a repository of entertainment system data from multiple sources (Williams, title). Williams teaches that "entertainment system data from multiple sources [may be] combined and stored in a sourceless format" (Williams, Col.

10, lines 61-62). However, even if this entertainment data is taken to be EPG data, which the Applicants do not concede, Williams does not teach that this combined entertainment data is subject to user-specified conditions.

Claims

Claims 45 and 47-70 are pending upon entry of this amendment of which claims 45, 56 and 64 are independent claims.

In contrast the cited art, Claim 45 teaches a number of modules including a writing module. As recited, the writer module collects the EPG data in the standardized modules from the one or more EPG loader modules, enforces a scaling of the collected EPG data according to factors provided by a user, and only then writes the scaled EPG data of the standardized format to a storage associated with the system.

Claim 56 recites a method (and Claim 64 recites a computer program product for implementing the method) in which the EPG data is received from a plurality of EPG data provides in a plurality of different formats. The EPG data is then reformatted into a standardized format compatible with the system. Then a scaling is enforced for the reformatted EPG data according to factors provided by the user. Only then is the scaled and reformatted EPG data written into the storage associated with the system. Accordingly, the claims recite, *inter alia*, scaling and reformatting prior to storage.

Accordingly, Claims 45, 56 and 64 are patentable over the cited art, either singly or in combination. The remaining dependent claims are patentable for at least the reasons provided for its respective independent claim.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 13th day of November , 2003.

Respectfully submitted,

ADRIAN J. LEE
Attorney for Applicant
Registration No. 42,785
Customer No.: 022913

WORKMAN NYDEGGER
1000 Eagle Gate Tower
60 East South Temple
Salt Lake City, Utah 84111
Telephone: (801) 533-9800
Fax: (801) 328-1707